Canadian Environmental Assessment Agency
Agence canadienne d'évaluation environnementale

A Framework for Analysis of the Quality of Screening Reports

Government of Canada
Quality Assurance Program for
Environmental Assessments under the
Canadian Environmental Assessment Act
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Canada

About this Report

This report describes a pilot study undertaken by the Canadian Environmental Assessment Agency (the Agency) in partial fulfillment of a commitment made to the Commissioner of the Environment and Sustainable Development (CESD).

The purpose of the study, a product of the Agency-led Quality Assurance Program for assessments conducted under the *Canadian Environmental Assessment Act* (the Act), was to develop a framework for analyzing the quality of screening reports and to validate the framework by applying it to a sample of 15 screening reports. Screenings are by far the most common form of environmental assessment conducted under the Act.

The framework encompasses indicators for demonstrating, through information provided in screening reports, whether the underlying screenings were in compliance with certain key provisions of the Act. It also addresses whether the screening report, and presumably the underlying screening, met an appropriate standard of quality.

The Agency's intent is to analyze current examples of typical screening reports against the framework on an ongoing basis, and to provide the results of those analyses to responsible authorities to enable continuous improvement.

The reports used to develop the framework were taken from the Agency's existing collection of screening reports completed in 2004 and 2005.

The primary purpose of the study was to test the utility of potential indicators of compliance and quality. It needs to be emphasized that there was no intention to develop a compliance and quality baseline for past screening reports. The sample of screening reports was too small to reliably assess, on a stand-alone basis, compliance and quality of screening reports of the period, or to support reliable comparisons with more recent screening reports evaluated by applying the same framework.

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1 INTRODUCTION

In his fall 2009 report, the Commissioner of the Environment and Sustainable Development (CESD) questioned the quality of documentation of many screenings, which made it unclear whether all requirements of the *Canadian Environmental Assessment Act* (the Act) were being met. He made the following recommendation: "The Canadian Environmental Assessment Agency should conduct an evaluation of the quality of environmental assessments, in particularly for screenings conducted under the *Canadian Environmental Assessment Act*, including assessing their effectiveness in protecting the environment."

The Canadian Environmental Assessment Agency (the Agency) agreed with the above recommendation and responded that it would develop a framework for the analysis of screening reports. It further indicated that the framework would encompass indicators of the key aspects of the environmental assessment, including the proposed mitigation measures; that screening reports would be analyzed against the framework on an ongoing basis; and that the analysis would be provided to responsible authorities to enable continuous improvement. It concluded with a commitment to publicly report the results of the analysis on an annual basis.

This report describes the Agency's work to develop the above-described framework and to test it on a sample of screening reports drawn from its existing library. The Agency is satisfied that its testing has confirmed the framework's suitability for its intended purpose.

2 METHODS

With the input of members of the Subcommittee on Quality Assurance of the Senior Management Committee on Environmental Assessment (SMCEA), the Agency developed an initial set of indicators for possible inclusion in the framework. They were subsequently tested on a sample of 15 screening reports (Table 1) selected from the Agency's library of screening reports for assessments commenced in 2004 and completed in either 2004 or 2005. The selected reports dealt with a range of project types with varying profiles in terms of their likely environmental effects and potential for eliciting the interest of members of the public.

Table 1. Screening Reports Analyzed in the Study

Project Title	Province	CEARIS #	Responsible Authority
Culvert Crossings and Relocation of Katzie Slough Tributary	BC	04-01-5343	Fisheries and Oceans Canada
Terrace Kitimat Airport Society - Runway 33 Extension	BC	04-01-5543	Western Economic Diversification Canada
Carseland - Bow River Headworks System Rehabilitation	AB	04-01-1229	Fisheries and Oceans Canada
Trans-Canada Highway Update, Banff National Park	AB	04-01-1367	Parks Canada Agency

Table 1. Screening Reports Analyzed in the Study			
Project Title	**Province**	**CEARIS #**	**Responsible Authority**
Construct Secure Campground for Parking 120 Vehicles	AB	04-01-5260	Department of National Defence
Black Lake Solid Waste Landfill	SK	04-01-8043	Indian and Northern Affairs Canada
Assiniboine Forest Drainage Enhancement	MB	04-01-2786	Environment Canada
Consolidation, Encapsulation and Monitoring of the Town of Churchill Landfill	MB	04-01-7277	Public Works and Government Services Canada
Temiskaming Community Pasture	ON	04-01-5244	Industry Canada
Highway 401/Country Road 41 Interchange Improvements, Town of Nappanee, Township of Richmond	ON	04-01-5554	Fisheries and Oceans Canada
Shoreland Reclamation, Paudash Lake, Cardiff Township	ON	04-01-7709	Department of National Defence
Route 2 Florenceville Bridge and Route 110 Interchange Upgrade	NB	04-01-2711	Transport Canada
Cobrielle Brook Restoration-Phase1	NS	04-01-5275	Parks Canada Agency
Infill along the Straight of Canso near Mulgrave, NS	NS	04-01-7527	Transport Canada
Tourism Infrastructure Development	NL	04-01-1358	Atlantic Canada Opportunities Agency

The testing process led to further refinement of the indicators until the point was reached where analysts were satisfied that the selected indicators provided an appropriate analytical framework for the full range of situations likely to be encountered. The final set of 16 indicators addressed the following six basic aspects of federal environmental assessment:

1. Compliance with the Act (Indicators 1 to 5)
2. Context for the reader (Indicators 6 to 8)
3. Public input (Indicators 9 to 11)
4. Environmental effects (Indicators 12 and 13)
5. Mitigation measures (Indicators 14 and 15)
6. Follow-up program (Indicator 16)

Further details on the indicators and the rationale for their selection are provided in Appendix 1.

It should be emphasized that the framework is not intended to be used as an overall yardstick of the adequacy of screening reports. It is often questionable whether a screening under the Act is the most appropriate environmental management mechanism for certain types of projects that currently require such assessments. Although it is still clearly necessary in those cases to meet legal requirements of the Act (Indicators 1 - 5), meeting a high standard of analysis and reporting (Indicators 6-16)

may not in every case represent the most effective and efficient expenditure of resources. For the above reasons, the framework is also potentially useful for identifying those types of situations where environmental assessment under the Act might not be the best approach for achieving environmental protection objectives, and where changes to the Act or its regulations might be worth considering.

It should also be emphasized that the three indicators that were designed to address the aspects related to public input to screenings are interrelated and interdependent. Only Indicator 9 (*Documenting the basis for determining whether or not to consult the public*) is applicable to all of the assessments studied, while Indicator 10 (*Direct or indirect public input to the screening*) is relevant only to the limited number of situations where such input was appropriate, and Indicator 11 (Reflection of public input in screening report) is relevant only to those same situations.

For all of the foregoing reasons, it is important that the reader interpret the indicators on an individual basis, and avoid using them collectively to calculate an "overall score".

3 RESULTS

The results of the analysis, based on the final set of indicators selected, are provided in Table 2 and discussed in the subsections that follow.

Table 2. Results of the Analysis of Screening Reports

Aspect	Indicator	Result		
		Yes	No	N/A
1. Compliance with Act	1. Consideration of environmental effects of project (other than those related to Indicators 2 and 3)	15	0	0
	2. Consideration of malfunctions and accidents	5	10	0
	3. Consideration of cumulative environmental effects	6	9	0
	4. Consideration of significance of environmental effects	8	7	0
	5. Consideration of measures to mitigate significant adverse environmental effects	15	0	0
2. Context for the Reader	6. Adequate project description	12	3	0
	7. Adequate environmental description	12	3	0
	8. Adequate description of potentially relevant past, present and future projects or activities	2	13	0
3. Public Input	9. Documentation of basis for determining whether or not to consult the public	5	10	0
	10. Direct or indirect public input to screening	9	6	0
	11. Reflection of public input in screening report	5	4	6

Table 2. Results of the Analysis of Screening Reports				
Aspect	**Indicator**	**Result**		
		Yes	**No**	**N/A**
4. Environmental Effects	12. Analysis of site-specific project environmental effects, or explanation why analysis not warranted.	7	8	0
	13. Analysis of cumulative environmental effects, or explanation why analysis not warranted	4	11	0
5. Mitigation Measures	14. Some mitigation measures tailored specifically to the project and its environmental setting	8	7	0
	15. Mechanisms identified for ensuring implementation of mitigation measures	7	8	0
6. Follow-up Program	16. Documentation of basis for determining whether or not a follow-up program was appropriate	7	8	0

3.1 Compliance with the Act

All screening reports demonstrated compliance with the Act in relation to Indicator 1 (*Consideration of environmental effects of project*) and Indicator 5 (*Consideration of measures to mitigate significant adverse environmental effects*). However, only 27% of the reports demonstrated compliance in relation to all five indicators.

Screening reports were weakest in relation to Indicator 2 (*Consideration of malfunctions and accidents*), which applied to 33% of the reports. Indicator 3 (*Consideration of cumulative environmental effects*) followed closely; it applied to 40% of the reports. Just over half of the reports demonstrated compliance with Indicator 4 (*Consideration of significance of environmental effects*).

The Act requires that screenings "include a consideration of" the factors that are captured by the five selected indicators of compliance. In conducting the study, this requirement has been interpreted in a narrow legal sense. Each factor associated with an indicator of compliance was deemed to have been "considered" if it was explicitly or implicitly addressed in the screening report. For example, the explicit mention of a factor, coupled with an unsubstantiated statement that the factor did not apply to the project in question, was deemed sufficient to satisfy the Act's requirement to consider the factor. Unsubstantiated statements were taken at face value, and their underlying validity was not explored or assessed.

In all of the screening reports examined, mitigation measures were specified for a considerable range of potential adverse environmental effects, not solely for those that might be considered significant without mitigation. Moreover, none of the screening reports identified which of the identified adverse environmental effects, if any, would have been significant in the absence of mitigation. It was assumed that such broadly based analyses of adverse environmental effects would have implicitly encompassed any effects that might have been considered significant without the application of

mitigation measures. Therefore, all 15 screening reports were assessed as being consistent with Indicator 5.

3.2 Context for the Reader

The following were identified as the key contextual elements of a screening report from the reader's standpoint:

- an adequate project description;
- an adequate environmental description; and
- an adequate description of potentially relevant past, present and future projects or activities

The range of potential readers of screening reports is potentially broad and diverse. He or she could be a member of the public; a generalist decision-maker in the responsible authority's organization; an officer of a provincial department or agency; a member of the proponent's organization; a member of an environmental non-government organization; an Aboriginal person; a student or academic; a member of the staff of the Commissioner of the Environment and Sustainable Development; or a member of Parliament. A reasonable level of education (Grade 11 or 12, or secondaire 4 or 5 in the Province of Quebec) and an absence of environmental specialist knowledge have been assumed. In every case the reader would need and expect clear, concise and complete information on the screening that had been conducted.

The term "adequate" from the reader's standpoint means that the screening report provides information at a sufficient level of detail to give the reader the necessary context for comprehending the analysis of environmental effects (including cumulative effects); the significance of those effects; and the measures specified for mitigating potential adverse effects. The standard of rigour applied in making the above judgement varied according to the relative scale and complexity of the project; the potential sensitivity of the project's environmental setting; and the likelihood of there being other projects or activities that would contribute to adverse cumulative environmental effects. Because the types of projects assessed by screening cover a very broad spectrum, and occur in a wide range of environmental settings, establishing specific criteria for rating adequacy of descriptions was judged to be impractical. It was necessary to exercise professional judgement on a case-by-case basis.

Of the 15 reports analyzed, 12 (80%) were judged to have provided sufficient information about both the project and its environmental setting to enable the reader to grasp the assessment of the project in isolation from other projects and activities (Indicator 6: *Adequate project description*; Indicator 7: *Adequate environmental description*). However, only two reports (13%) were judged to provide the reader with sufficient contextual information to grasp possible cumulative environmental effects implications (Indicator 8: *Adequate description of potentially relevant past, present and future projects or activities*).

3.3 Public Input

Five of the 15 screening reports documented the basis for determining whether or not to consult the public, as per paragraph 7.1.3 of the *Ministerial Guideline on Assessing the Need for and Level of Public Participation in Screenings under the Canadian Environmental Assessment Act* (Indicator 9: *Documentation of basis for determining whether or not to consult the public*). It should be noted that the reports analyzed in the study pertained to screenings that had been conducted well before the 2006 date of issue of the above *Ministerial Guideline*. Consequently, it would have been unrealistic to expect that a significant proportion of the screening reports would have met this particular criterion. However, this should not be the case when more recent screening reports are analyzed.

Sixty percent of the screening reports (9 out of 15) stated that public input had been either directly sought, or indirectly obtained through other means (Indicator 10: *Direct or indirect public input to screening*). However, the nature of that input or how it had affected the assessment was reflected in only five of those nine reports (Indicator 11: *Reflection of public input in screening report*).

Three screening reports indicated that specific commitments had been made as a result of the input received. One stated that project activities would be rescheduled to avoid conflict with a particular traditional land use of a First Nation; another that an area earmarked for a habitat compensation scheme would be relocated in response to public input; and a third that public input had influenced the design of the proposed project.

3.4 Environmental Effects

As discussed in section 3.1, the environmental effects of projects were considered in every case; however, this was more typically done at a generic level. Only 7 of the 15 reports analyzed (47%) contained any qualitative or quantitative analysis of site-specific project effects or any explanation that such analysis was not warranted (Indicator 12: *Analysis of site-specific project environmental effects, or explanation why analysis not warranted*).

Analyses or explanations related to cumulative environmental effects (Indicator 13: *Analysis of cumulative environmental effects, or explanation why analysis not warranted*) were less prevalent, occurring in only 4 of the 15 screening reports (27%). Moreover, in two of those cases, the term "cumulative effects" was not interpreted in a manner consistent with the Act.

3.5 Mitigation Measures

Mitigation measures specifically related to the project and its environmental setting were proposed in 8 out of 15 screening reports (53%) (Indicator 14: *Some mitigation measures tailored specifically to the project and its environmental setting*) and 7 out of 15 reports proposed mechanisms to ensure their implementation (Indicator 15 *Mechanisms identified for ensuring implementation of mitigation measures*).

3.6 Follow-up Program

A follow-up program is defined in the Act as "a program for a) verifying the accuracy of the environmental assessment, and b) determining the effectiveness of any measures taken to mitigate the adverse environmental effects of the project". Follow-up programs for projects assessed by screening are discretionary under section 38(1) of the Act.

The Act links the responsible authority's decision on the appropriateness of a follow-up program to its decision, under paragraph 20(1)(*a*), on its course of action in respect of the project. Although the Act is silent on whether the need for, and the requirements of, a follow-up program should be addressed during the conduct of the screening, that would nevertheless be the ideal time and place to address those questions. (In the cases of comprehensive studies and panel reviews, the Act requires those same questions to be addressed during the conduct of the assessment.) Therefore it is reasonable to expect that the same questions be addressed in the screening report (Indicator 16: *Documentation of basis for determining whether or not a follow-up program was appropriate*). That occurred in 7 of the 15 screening reports examined, but in the remaining cases the question of the need for a follow-up program was not addressed.

4 CONCLUSIONS

The results of the study clearly demonstrated that the final set of indicators tested adequately captured the range in variability of screening reports from the standpoints of demonstrating compliance with the Act and quality of the underlying screening-level environmental assessment. Those indicators captured many key aspects of federal screening practice, were relatively straightforward to apply, and demonstrated adequate discernment of variability. As such it was concluded that they were suitable for tracking change over time. Consequently, the set of indicators developed in this pilot study will continue to be used on an ongoing basis as the framework for analyzing the quality of federal screening reports.

The study indicated that screening reports vary considerably in their demonstration of compliance with the Act and the quality of the underlying assessment. Although screenings clearly must comply with the Act, the need for a consistent level of quality should be critically examined.

As previously suggested in Section 2, failure to meet the quality standard implied by a specific indicator does not necessarily imply a requirement to improve quality; it may equally imply that a screening under the Act may not be the most appropriate mechanism for managing the environmental effects of the project in question, and that other potential mechanisms may warrant consideration.

The study was based on a small sample of readily available screening reports pertaining to screenings completed in 2004 and 2005. Practices may have evolved since that time.

The primary purpose of the study was to test the utility of potential indicators of compliance and quality. It needs to be emphasized that there was no intention to develop a compliance and quality baseline for past screening reports. The sample of screening reports was too small to reliably assess, on a stand-alone basis, compliance and quality of screening reports of the period, or to support reliable comparisons with more recent screening reports evaluated by applying the same framework.

APPENDIX 1

Rationale for the Indicators in the Proposed Framework for Analyzing the Quality of Screening Reports

LEGISLATIVE BACKGROUND

The *Canadian Environmental Assessment Act* (the Act) defines a screening as "an environmental assessment that is conducted pursuant to section 18 and that includes a consideration of the factors set out in subsection 16(1)".

Section 18 of the Act stipulates that a responsible authority "shall ensure that a) a screening of the project is conducted; and b) a screening report is prepared". A screening report is defined in the *Canadian Environmental Assessment Act* as "a report that summarizes the results of a screening". Consequently, a key assumption of this study is that a screening report should also include a consideration of the factors listed in subsection 16(1) of the Act.

Sections 20 and 38 of the Act respectively set out requirements related to ensuring the implementation of mitigation measures and considering the need for, designing and ensuring the implementation of follow-up programs. These requirements come into effect once the responsible authority takes a course of action after taking into account the screening report and related comments from the public. Consequently, there is no legal requirement to address those considerations in the screening report. Nevertheless, addressing those issues in the screening report would be most appropriate, and consequently they have been included among the indicators of quality.

PROPOSED FRAMEWORK

This study involved the development and testing of a framework of 16 high-level indicators whereby screening reports demonstrate that the underlying screening was in compliance with the Act or met a certain standard of quality. Five indicators specifically addressed compliance with the Act, and the remaining 11 addressed various aspects of the quality of the underlying screening-level assessment.

Compliance with the Act

Indicators 1 to 5 deal with demonstrating compliance with the Act. The paragraphs of the Act to which the criteria pertain are indicated in brackets.

Any indication in a screening report that the factor in question had been considered was interpreted as evidence of compliance. All statements were taken at face value, and no attempt was made to obtain or analyze information that would corroborate those statements.

Indicator 1: Consideration of environmental effects of project [paragraph 16(1)(*a*)]

The screening report describes environmental effects of the project (excluding effects associated with potential malfunctions or accidents, and cumulative effects)

Indicator 2: Consideration of malfunctions and accidents [paragraph 16(1)(*a*)]

The screening report describes the effects of possible malfunctions and accidents, or alternatively, demonstrates or explicitly states that such effects are either trivial or not realistically possible.

Indicator 3: Consideration cumulative environmental effects [paragraph 16(1)(*a*)]

The screening report describes the environmental effects of the project in combination with other projects or activities that have been or will be carried out (cumulative effects), or alternatively, demonstrates or explicitly states that such effects are either trivial or not realistically possible.

Indicator 4: Consideration of significance of environmental effects [paragraph 16(1)(*b*)]

The screening report identifies which effects of the project are significant, or alternatively, demonstrates or explicitly states that there are no significant effects.

Indicator 5: Consideration measures to mitigate significant adverse environmental effects [paragraph 16(1)(*d*)]

The screening report describes measures to mitigate any identified significant adverse environmental effects of the project. In those far more common situations where significant adverse environmental effects (without mitigation) are not identified, but mitigation measures are nevertheless specified, the indicator is deemed to apply implicitly.

Quality

Indicators 6 to 16 address the quality of the screening report itself. Application of these criteria necessarily implies a certain element of subjectivity. Therefore, for purposes of ensuring consistency, an effort has been made to describe each indicator in as objective terms as possible.

Context for the Reader

Indicators 6 to 8 are based on the idea that the reader of the screening report needs to be provided with certain minimum contextual information regarding the project, the environment in which it is situated, and surrounding projects and activities in order to understand the screening report. In the case of screenings of very simple projects, the needed context may be minimal. In the case of screenings of complex projects, it may be necessary to provide information of considerable variety and detail.

Indicator 6: Adequate project description

The screening report provides a description of the nature, timing and location of the project components and stages sufficient to enable the reader to understand interactions between the project and its biophysical and human environment. It is not necessary or desirable to describe elements of the project that do not come into play in the analysis.

Indicator 7: Adequate environmental description

The screening report provides a description of the physical and biophysical components of the environment (e.g., air, surface and subsurface water, terrain, vegetation, fish and wildlife) sufficient to enable the reader to understand interactions between the project and the described elements of the environment.

Indicator 8: Adequate description of potentially relevant past, present and future projects or activities

The screening report provides a description of other projects or activities that have been or will be carried out in the vicinity of the project. This description is sufficient to enable the reader to understand potential interactions between the project and those other projects and activities, and any related cumulative effects implications.

Public Input

Indicators 9 to 11 address expectations surrounding public participation in screenings and how the results of that activity should be reflected in the screening report. The *Ministerial Guideline on Assessing the Need for and Level of Public Participation in Screenings under the Canadian Environmental Assessment Act*, along with its associated *Public Participation Guide*, have influenced the selection of indicators.

Indicator 9: Documentation of basis for determining whether or not to consult the public

This indicator pertains to the responsible authority's determination under subsection 18(3) of the Act as to whether public participation in the screening of a project is appropriate in the circumstances. It is based on subsection 7.1.3 of the *Ministerial Guideline on Assessing the Need for and Level of Public Participation in Screenings under the Canadian Environmental Assessment Act*, which calls for documentation of the basis on which the responsible authority made its "determination of whether or not to consult the public".

Indicator 10: Direct or indirect public input to screening

The screening report provides information on any efforts made by the responsible authority, another relevant jurisdiction or the proponent to obtain public input either directly or indirectly (e.g., through records of prior consultations on related matters).

It should be noted that this indicator provides only factual information about whether public input was sought; such action is not appropriate in every case.

Indicator 11: Reflection of public input in screening report

The screening report demonstrates how any input received directly or indirectly from the public during the conduct of the screening was taken into account in the conduct of the screening. It should be noted that this indicator is not meant to address comments received from the public after a screening report is made available to the public in accordance with paragraph 18(3)(*b*) of the Act.

Environmental Effects

The Act requires a consideration of "the environmental effects of the project". It also requires a consideration of "any cumulative environmental effects that are likely to result from the project in combination with other projects or activities that have been or will be carried out". In neither case, however, does it give any indication of quality standards for considering such effects.

The previously described Indicators 1 and 3 deal solely with compliance with the Act, in relation to the consideration of project environmental effects and cumulative environmental effects, respectively. Simple statements about environmental effects and simple graphical depictions of interactions between project elements and environmental components would satisfy the requirements of the Act, even if they were not backed up by more detailed qualitative or quantitative analysis.

Indicators 12 and 13 address the quality of treatment of environmental effects in the screening report. A higher quality of treatment implies the existence of at least some qualitative or quantitative analysis backing up the important conclusions reached, or an explanation of why such analysis is not warranted.

Indicator 12: Analysis of site-specific project environmental effects, or explanation why analysis not warranted

The screening report goes beyond simply listing or tabulating environmental components that will be adversely affected by the project, and provides some site-specific, qualitative or qualitative analysis of project environmental effects. Where such analysis is not warranted, an explanation is given as to why this is the case (e.g., effects are so trivial that their analysis would be meaningless).

Indicator 13: Analysis of cumulative environmental effects, or explanation why analysis not warranted

The screening report provides some qualitative or qualitative analysis of cumulative effects or the rationale for why it was not appropriate to analyze cumulative environmental effects (e.g., no adjacent projects or activities that the project could interact with)

Mitigation Measures

Indicators 14 and 15 address how mitigation measures are handled in screening reports.

Indicator 14: Some mitigation measures tailored specifically to the project and its environmental setting

In certain situations the screening report outlines mitigation measures that are tailored to the specific environmental conditions of the site. It does not refer solely to standard types of environmental practices or to obeying applicable laws, regulations and codes of practice.

Indicator 15: Mechanisms identified for ensuring implementation of mitigation measures

Subsection 20(2) of the Act requires a responsible authority to ensure the implementation of any mitigation measure it has taken into account in taking its course of action (screening decision) under paragraph 20(1)(*a*) of the Act. Although this is not one of the factors listed in subsection 16(1) that must be considered in a screening report and by logical extension in a screening, it would nevertheless seem reasonable to expect the question of ensuring implementation of mitigation measures to be addressed in the screening report.

Follow-up Program

Subsection 38(1) of the Act indicates that when a responsible authority determines that a follow-up program is appropriate in the circumstances, "it shall design a follow-up program and ensure its implementation". Although subsection 16(1) of the Act does not list this as a factor that must be considered in a screening, and by logical extension in a screening report, it would nevertheless seem reasonable to expect the question of the need for a follow-up program to be explicitly addressed in a screening report. A screening report makes predictions and proposes mitigation measures and is therefore the logical place to address any uncertainties about the screening, and whether or not a follow-up program should be undertaken to verify the accuracy of the assessment or to determine the effectiveness of proposed mitigation measures.

Indicator 16: Documentation of basis for determining whether or not a follow-up program was appropriate

The screening report addresses the issue of whether or not a follow-up program should be undertaken, regardless of whether the specific term, "follow-up program", is used in the report.